

EXHIBIT 2

From: [Kirkpatrick, Sarah](#)

Sent: Thursday, March 2, 2023 1:14 PM

To: [Robert Gilbert](#); [Carbone Defs Service@listserv.whitecase.com](#)

Cc: [568 Litigation](#); [568_litigation@gilbertlitigators.com](#)

Subject: RE: Seeking to Confirm A Full and Responsive Production By Defendants

Bob –

As the defendants have consistently reiterated, both orally and in writing, our global meet and confer discussions were subject to each individual defendant's written responses and objections, which we have expressly preserved. As such, each defendant has been proceeding with their collection, review, and production in accordance with its written responses and objections and the subsequent Defendant-specific meet and confers that it had with plaintiffs. For Notre Dame, for example, I note that we held individual meet and confer discussions on November 14 and December 7, and exchanged several emails following up on those conversations. But plaintiffs did not raise—and we did not discuss—any particular request or Notre Dame's responses and objections thereto. I understand the same is true for other defendants as well.

If plaintiffs have concerns about the parameters of any individual defendant's production, at this late stage in the process, they should meet and confer with that defendant about their concerns.

Thanks,

Sarah

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